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Judge Kiyo A. Matsumoto
United States District Court
Eastern District Court
225 Cadman Plaza East
Brooklyn, New York

Re: Trustees of Local 813, et al. v. Joro Carting, Inc.
Docket No. 07 CV 04710

Honorable Judge Matsumoto:

A settlement agreement was prepared by defendant's counsel that contained a general release. The Plaintiff is willing to sign a general release for the period covered in the action, which was an audit from 2003 – 2005. However, the Defendant is insisting that the general release cover 2003 to the present. I cannot in good conscience sign such a settlement. The Funds have a right to conduct an audit for the years 2006 forward if they so desire. I believe the defendant is being unreasonable, especially since we are dealing with Trust Funds monitored by the Department of Labor.

Based upon the foregoing I would appreciate if your Honor would schedule a conference call to help in finally resolving this matter.

Thank you for your consideration.

Respectfully submitted,



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